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 SAMSUNG SDI CO., LTD. and
 SAMSUNG SDI AMERICA, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

Master Case No. 3:07-md-1827-SI
 MDL NO. 1827

This Document Relates to:

Case Nos. 3:09-cv-5840-SI;
 3:09-cv-4997-SI;
~~3:09-cv-4945-SI~~
 10-4945

Motorola Mobility, Inc. v. AU Optronics Corp., et al.,
AT&T Mobility LLC v. AU Optronics Corp., et al.,
Target Corp. v. AU Optronics Corp., et al.,

**STIPULATION AND ~~[PROPOSED]~~
 ORDER RE EXTENSION OF TIME TO
 MOVE TO COMPEL**

1 Defendants Samsung SDI Co., Ltd. and Samsung SDI America, Inc. ("SDI") and Plaintiffs
2 Motorola Mobility, Inc. ("Motorola"); AT&T Mobility, LLC, AT&T Corp., AT&T Services, Inc.,
3 BellSouth Telecommunications, Inc., Pacific Bell Telephone Company, AT&T Operations, Inc.,
4 AT&T DataComm, Inc., Southwestern Bell Co. ("AT&T"); Target Corp.; Sears Roebuck and Co.;
5 Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc. ("Target", and
6 collectively with Motorola and AT&T, "Plaintiffs"), stipulate as follows:

7 Whereas, Motorola served its responses to the First Set of Interrogatories and the First Set
8 of Requests for Production of Documents propounded by defendant SDI in the above-captioned
9 case on October 24, 2011;

10 Whereas, the AT&T and Target plaintiffs served their responses to discovery requests
11 propounded by defendant SDI in the above-captioned cases on December 7, 2011 pursuant to a
12 prior Stipulation and Order [Dkt. No. 4216];

13 Whereas, SDI and Plaintiffs met and conferred regarding Motorola's response to SDI'S
14 First Set of Interrogatories, No.1 and SDI'S First Demand for Production of Documents, No. 17,
15 and regarding the AT&T and Target plaintiffs' responses to SDI'S First Set of Interrogatories, First
16 Set of Requests for Admission, and First set of Demands for Production of Documents (the
17 "Discovery Requests") on December 20-21, 2011;

18 Whereas, the current deadline for SDI to file motions to compel with respect to the
19 Discovery Requests in the above-captioned cases is December 23, 2011 [Dkt. Nos. 4216 and
20 4353]. Plaintiffs have agreed to supplement certain of their responses and will consider
21 supplementing various other responses to the Discovery Requests, and Plaintiffs have agreed to
22 permit SDI additional time to move to compel further responses to the Discovery Requests.

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
24 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and SDI, on
25 the other hand, as follows: (i) Plaintiffs' deadline to provide any supplemental responses to the
26 Discovery Requests shall be extended to January 30, 2012; and (ii) SDI's deadline to move to
27 compel further responses to the Discovery Requests shall be extended to February 13, 2012.

1 Dated: December 21, 2011

2 /s/ Eric S. O'Connor

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11 *Counsel for Defendants Samsung SDI America, Inc.*
12 *and Samsung SDI Co., Ltd.*

13 Dated: December 21, 2011

14 /s/ Joshua C. Stokes

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Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this document has been obtained from each of the above signatories.

1 **IT IS SO ORDERED.**

2
3 Dated: 1/9/12, 2011

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7 Susan Illston, United States District Judge